

SOUTHERN - HOUSTON  
UNITED STATES DISTRICT COURT - ~~EASTERN~~ DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$200,000.00 IN U.S. CURRENCY AND  
ALL OTHER NON-CONTRABAND  
ITEMS SEIZED;

Defendant *In Rem*.

Nhat Hoang Dinh,

Claimant

No. 4:07-03043

VERIFIED CLAIM OF OWNERSHIP

PLEASE TAKE NOTE that Nhat Hoang Dinh, by and through his attorney Jeffrey Steinborn, hereby claims an ownership and/or possessory interest in the defendant property in this matter (US Customs Receipt #3250009 and Case #20075301000115), such claim being superior to that of any other person or entity, including, but not limited to, the United States of America.

VERIFIED CLAIM OF OWNERSHIP - 1

JEFFREY STEINBORN, PLLC  
1800 SEATTLE TOWER  
1218 THIRD AVENUE  
SEATTLE, WASHINGTON 98101  
(206) 622-5117 • FAX: (206) 622-3848

1 Claimant, Nhat Hoang Dinh, by and through his attorney, hereby demands  
2 restitution of said property in its entirety and demands the right to defend this action.

3 This claim is made on behalf of the Claimant, Nhat Hoang Dinh, by his attorney, the  
4 undersigned, who is duly authorized to make said claim and act in Claimant's best interest.

5 Dated this 27 day of April, 2007.

6 JEFFREY STEINBORN, PLLC

7  
8 Jeffrey Steinborn  
WSBA #1938

9 Counsel for Claimant Nhat Hoang Dinh

10 VERIFICATION

11 STATE OF WASHINGTON )

12 COUNTY OF KING )

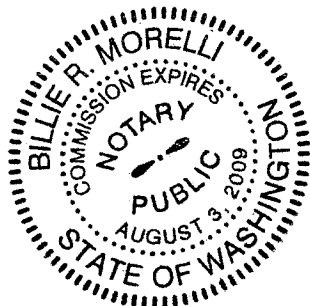
ss.

13 I, NHAT HOANG DINH, declare and affirm as follows:

14 I am the Claimant herein and declare that the information contained in the above  
15 Claim of Ownership is true and correct.

16  
17 Nhat Hoang Dinh

18 SUBSCRIBED AND SWORN TO before me this 27 day of April, 2007



25 NOTARY PUBLIC in and for the State of  
Washington, residing at SEATTLE  
My commission expires 8.3.09

VERIFIED CLAIM OF OWNERSHIP - 2

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SEATTLE, WASHINGTON 98101  
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U.S. CUSTOMS AND BORDER PROTECTION  
SEIZURE CASE: 2007-5301-000115.

UNITED STATES CUSTOMS SERVICE  
SEIZED ASSET CLAIM FORM

JEFFREY STEINBORN, PLLC  
3161 ELLIOTT AVENUE STE 340  
SEATTLE, WA 98121

Name: Nhat Dinh

Address: 206 622-5117

Telephone No: (206) 622-5117

(IMPORTANT: BE SURE TO COMPLETE ALL PARTS BELOW)

As authorized by 18 USC 983(a)(2)(A), I request that the Government file a complaint for forfeiture on the seized property described below:

PART I

List all the items in which you claim an interest. Include sufficient information to identify the items, such as serial numbers, make and model numbers, aircraft tail numbers, photographs, and so forth. Attach additional sheets of paper if more space is needed.

*All currency and non-contraband items  
Seized. See letter of Claim, attached.*

PART II

State your interest in each item of property listed above. Attach additional sheets of paper if more space is needed.

Part III

*Possessory and/or ownership*

I attest and declare under penalty of perjury that the information provided in support of my claim is true and correct to the best of my knowledge and belief.

Nhat Dinh  
Name (Print)

7/02/07  
Date

[Signature]  
Signature

A FALSE STATEMENT OR CLAIM MAY SUBJECT A PERSON TO PROSECUTION UNDER 18 U.S.C. 1001 AND/OR 1621 AND IS PUNISHABLE BY A FINE AND UP TO FIVE YEARS IMPRISONMENT.

[Signature]  
Alfredo D. Barela  
Consular Officer  
Socialist Republic of Vietnam  
Ho Chi Minh City  
U.S. Consulate General

Socialist Republic of Vietnam  
Ho Chi Minh City  
U.S. Consulate General } SS

I do hereby certify that on  
02 JUL 2007  
before me personally appeared  
NHAT HOANG DINH  
known or proved to me to be  
the same person who executed  
the foregoing instrument and  
acknowledged to me that he



JEFFREY STEINBORN, PLLC  
ATTORNEY AT LAW

JEFFREY STEINBORN

1800 SEATTLE TOWER  
1218 THIRD AVENUE  
SEATTLE, WA 98101  
(206) 622-5117  
FAX: (206) 622-3848

April 24, 2007

*Sent via Federal Express Overnight to:*

Fines and Penalties Division  
Bureau of Customs and Border Protection  
U.S. Dept. of Homeland Security  
2350 N Sam Houston Parkway E #1000  
Houston, TX 77032  
P: 281-985-6700  
F: 281-985-6729

Re: *Custody Receipt for Seized Property #3250009*  
*ENF-4-H:FPF SCR*  
*CN: 2007-5301-000115*

Dear Sir or Madam:

Please be advised that Nhat Hoang Dihn, by and through his attorney, Jeffrey Steinborn, claims an ownership and/or possessory interest in the approximately \$200,000.00 in U.S. currency, and all other non-contraband items, seized on March 30, 2007, at Houston, Texas, which is the subject of Custody Receipt for Seized Property # 3250009 and Case #2007-5301-000115.

Mr. Dinh, by and through his attorney, Jeffrey Steinborn, requests that you transmit his claim to the United States Attorney for the Eastern District of Texas for initiation of appropriate judicial proceedings.

Please contact us immediately if you have any questions or concerns regarding this matter.  
Thank you.

Yours very truly,

JEFFREY STEINBORN, PLLC

Jeffrey Steinborn



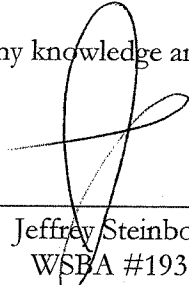
FORFEITURE COUNSEL  
APRIL 24, 2007

JEFFREY STEINBORN, PLLC  
PAGE 2 OF 2

VERIFICATION

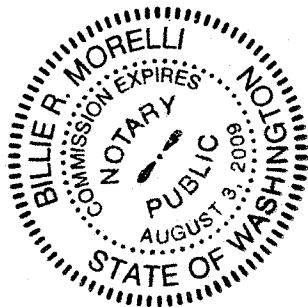
STATE OF WASHINGTON     )  
  )  
COUNTY OF KING         )

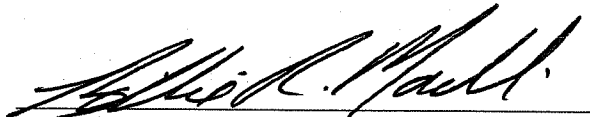
I, Jeffrey Steinborn, being first duly sworn on oath, depose and say under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Jeffrey Steinborn  
WSBA #1938  
Counsel for Claimant Nhat Hoang Dihn

SUBSCRIBED AND SWORN to before me this 29 day of April, 2007.



  
Print Name: BILLIE R. MORELLI  
Notary Public in and for the State of  
Washington, residing at Seattle  
My appointment expires: 8.3.08